

UNITED STATES DISTRICT COURT
for the
NORTHERN DISTRICT OF ALABAMA

HEATHER LESLIE, on behalf of herself and all)	
others similarly situated,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Action No. 5:20-cv-00629-HNJ
REDSTONE FEDERAL CREDIT UNION,)	
)	
Defendant.)	

REPORT OF THE PARTIES' PLANNING MEETING

1. The following persons participated in a Rule 26(f) conference on June 15, 2020 by telephone:

 Jeffrey D. Kaliel, representing Plaintiff
 Andrew J. Demko, representing Defendant
2. Initial Disclosures. The parties will complete the initial disclosures required by Rule 26(a)(1) by July 13, 2020.
3. Discovery Plan. The parties propose this discovery plan:
 - (a) Discovery will be needed on these subjects: the allegations in the Complaint; any issues related to class certification; Defendant's agreements with its members; and Defendant's disclosures to its members.
 - (b) Dates for commencing and completing discovery, including discovery to be commenced or completed before other discovery: The parties intend to commence discovery after Defendant files its responsive pleading. The parties propose a discovery cutoff of September 20, 2021.
 - (c) Maximum number of interrogatories by each party to another party, along with the dates the answers are due: The parties do not anticipate needing more than 25 interrogatories each. The parties intend to respond to any interrogatories within the time limits set by Rule 33.
 - (d) Maximum number of requests for admission, along with the dates responses are due: The parties do not anticipate needing more than 25 requests each. The parties intend to respond to any requests within the time limits set by Rule 36.
 - (e) Maximum number of depositions by each party: 5 for each party
 - (f) Limits on the length of depositions, in hours: standard time limits set by Rule 30
 - (g) Dates for exchanging reports of expert witnesses: 90 days before the close of discovery
 - (h) Dates for supplementations under Rule 26(e): The parties should supplement their discovery responses as soon as reasonably practicable, but no later than the close of discovery.
4. Other Items:
 - (a) A date if the parties ask to meet with the court before a scheduling order: Not applicable

- (b) Requested date for pretrial conference: December 6, 2021
- (c) Final date for the plaintiff to amend pleadings or to join parties: August 28, 2020
- (d) Final date for the defendant to amend pleadings or to join parties: August 28, 2020
- (e) Final date to file dispositive motions: October 18, 2021
- (f) State the prospects for settlement: The parties anticipate that they will engage in both formal and informal settlement discussions, but it is premature at this point in the litigation to determine the likelihood of settlement.
- (g) Identify any alternative dispute resolution procedure that may enhance settlement prospects: Private mediation
- (h) Final dates for submitting Rule 26(a)(3) witness lists, designations of witnesses whose testimony will be presented by deposition, and exhibit lists: November 8, 2021
- (i) Final dates to file objections under Rule 26(a)(3): November 22, 2021
- (j) Suggested trial date and estimate of trial length: December 13, 2021; the parties anticipate that trial would last 5 days.
- (k) Other matters: Defendant intends to file a motion to dismiss the Complaint. To the extent this case continues beyond the pleading stage, this case will not be ready for trial within twelve months of its filing. The case is complex, will require extensive discovery, including expert discovery, and involves a potential motion for class certification.

The parties also propose that a deadline should be set for the filing of a class certification motion that is 30-45 days prior to the discovery cutoff.

Date: June 29, 2020

/s/ Andrew J. Demko

Andrew J. Demko (pro hac vice)
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Date: June 29, 2020



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Dated: June 29, 2020

/s/Arthur Stock

Lisa A. White (admitted *pro hac*)

Arthur Stock (admitted *pro hac*)

Ryan P. McMillan (admitted *pro hac*)

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